## REMARKS

This paper is responsive to a Non-Final Office action dated November 28, 2006. Claims 1-29 were examined.

### *Claim Rejections – 35 U.S.C. §103*

Claims 1-12, 14-15, 18-25, and 27-29 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,594,245 to Rimhagen et al. (hereinafter, "Rimhagen") in view of U.S. Patent No. 6,389,264 to Halonen (hereinafter, "Halonen"). Claims 13 and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Rimhagen in view of Halonen as applied to claims 1 and 15 above, and further in view of U.S. Patent No. 6,427,075 to Burg et al. (hereinafter, "Burg"). Claims 16 and 17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Rimhagen in view of Halonen as applied to claim 15 above, and further in view of U.S. Publication No. 2003/0061422 to Repice et al. (hereinafter, "Repice").

### *Claims 1, 15, and 27*

One aspect of the present invention is to compensate for a fixed delay associated with a transport medium coupling a remote air interface radio portion and a centralized radio processing portion of a cellular communications system. The cellular communications system also accounts for the variable delay between the air interface radio portion and a mobile communications device. The Office action admits that Rimhagen does not teach compensating for a fixed delay associated with the transport medium coupled to one of the remote air interface portions and relies on Halonen for that teaching. Specifically the Office action states that "Halonen teaches compensating for a fixed delay associated with the transport medium coupled to one of the air interface portions. (Col. 4 lines 33-39, lines 54-57)." The applicants respectfully disagree.

Halonen relates to inserting varying units of delay in the signal path between a remote device and a central device in which the units of delay are a fraction of the smallest timing advance duration. See Abstract. In Halonen, the central device is the BTS. Col. 4, line 29. Halonen is directed to more accurately determining the distance of the remote device to the central device. See Abstract. Halonen does not teach or contemplate compensating for a fixed delay associated with the transport medium coupled to one of the air interface portions. The

Office action points to col. 4, lines 33-39. The full paragraph including those lines states (the underlines portion was pointed to in the Office action):

> Provided an accurate estimation of location is needed, the "yes" branch of the loop is taken at step 205. A potential trigger for estimating location may be an event, such as a 911 call, which the network can detect by examining the call class information associated with the call. When the "yes" branch is taken, the BTS or other central device determines whether timing advance change criteria indicate a timing advance change at step 209, to sense, in this case, if the TA setting in the SACCH message has been configured to increase the timer advance. A determination is made at step 209 if a SACCH has been configured to the mobile station, and operation of the loop is halted until a new SACCH is configured, i.e., the steps of the loop occur once for each SACCH. If the answer for the timing advance change criteria determined at step 209 is "no," a stepsize is added to the delay at step 211 (1 in the example).

Halonen makes clear that "[t]he point of adding a delay at the BTS is to influence the operation of the setting of the TA in the SACCH that occurs in the GSM network 109." Col. 4, line 103. There is no teaching regarding a fixed delay associated with the transport medium coupling the centralized radio processing portion to one of the air interface portions. In fact, Halonen is trying to determine a variable delay with greater accuracy. The Office action also points to col. 4, lines 54-57 which describe the evaluations in the flow chart of Fig. 3. Again, nowhere does Halonen contemplate a delay associated with a transport medium coupling the centralized radio processing portion and the air interface portion. For this reason, applicants respectfully submit that claim 1 and all claims dependent thereon distinguish over the references of record.

Applicants respectfully submit that similar arguments apply to independent claims 15 and 27. Namely, Halonen fails to teach compensating for a fixed delay associated with the transport medium coupling the host processing part and the remote radio interface part (claim 15) and means for compensating for a fixed delay associated with the transport medium (claim 27). Thus, applicants respectfully submit that all claims dependent on 15 and 27 also distinguish over the references of record for at least the reason described for their independent claims.

## *Conclusion*

In summary, claims 1-29 are in the case. All claims are believed to be allowable over the art of record, and a Notice of Allowance to that effect is respectfully solicited. Nonetheless, if any issues remain that could be more efficiently handled by telephone, the Examiner is requested to call the undersigned at the number listed below.

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